

I own, operate and maintain several Packet Cluster nodes that operate on various VHF and UHF bands, 2 of which are on 440 MHz. I have an investment of around \$5,000 in this equipment. Most of the packet digis and nodes had been on 220 MHz in Indiana half of the band was reallocated. The move to 440 MHz caused hard feeling by other amateurs being displaced and expensive.

I am also active on VHF and UHF SSB & CW. I own a Yaesu FT 736 cover 144 MHz, 222 MHz, 432 MHz and 1.2GHz it cost about \$3,000 and I have about the same amount in antennas, coax, preamps, rotor and tower. This does not include my 144/440 MHz HTs and other FM equipment.

I am active on 440 MHz band, Amateur TV got me interested in Ham Radio and it has had an influence of my career choice. The band is key to amateur radio.

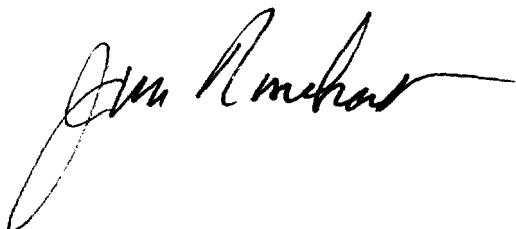
I do agree that unlike business radio, activity on the 440 MHz band low during the day as most of us are at work. There has been a decline in repeater activity over the last couple of years. There might be room for sharing of the band, maybe business use of amateur repeater with the use of different PL Tones for Hams and the business users.

It might be time for both the PMRS and ARS to step back and look at how there frequencies are used. There is no requirement that the number of amateur radio repeaters in an area be based on the amateur population or justify the need for the repeater. I don't think PMRS licenses are issued based on those requirements either.

With cellular phones being so popular I know a lot of business shifted for mobile radio to them the convenience and better coverage. We have seen the decline of the use of our autopatch on the repeater due to cell phones. My brother who is a farmer switch from business radio to cell phone as did the company that services my furnace. I would assume this is a trend and should free up some of the business frequencies but put more demands on cell frequencies.

Jim Rinehart K9RU

1455 North Shannon  
Indianapolis, Indiana 46201

A handwritten signature in black ink, appearing to read "Jim Rinehart", with a stylized, flowing script.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
An Allocation of Spectrum for )  
Private Mobile Radio Services ) RM-9267  
 )

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for-profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile

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services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band:

SALVATION ARMY ,AMERICAN RED CROSS ,FEMA,LOCAL CITY AND COUNTY  
GOVERNMENTS

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,



DAVID L. MC DONALD AB5SG  
110 VISTA HILLS BLVD  
VAN BUREN, AR 72956

May 30,1998

DOCKET FILE COPY ORIGINAL  
466 Margarita Avenue  
Palo Alto, California 94306  
May 22, 1998

Office of the Secretary,  
Federal Communications Commission,  
Room 222, 1919 M Street NW,  
Washington, DC 20554

## **Comment Re: Petition for Rulemaking RM-9267**

Dear Sir or Madam:

I am writing to express my concern regarding Petition for Rulemaking RM-9267, to reallocate portions of the 420-450 MHz band from Federal use to the Private Mobile Radio Service. As an amateur radio operator who enjoys Amateur Radio's secondary allocation on this band, I feel deeply concerned about the impact such a reallocation would have on the Amateur Radio community.

The Amateur Radio community in California makes extensive use of this frequency band, for routine communications as well as emergency and disaster-relief assistance. We also use this band to provide public service communications at events such as marathons and bike races, and for the relaying of message traffic from California to elsewhere in the world.

Reallocation of this band would seriously impair those important functions. Currently, the only bands on which many Amateur Radio operators, myself included, operate are the 2M (144-148 MHz) and 70cm (430 - 450 MHz). If the 420-450 MHz band were reallocated, the amateur radio community which uses it would be forced to try to fit into the already over-crowded 2M band, which has only 4 MHz of spectrum allocated for Amateur Radio use. This would create unacceptable levels of interference on this band, and would severely hinder our ability to provide the public service and disaster communication services which we currently provide to the community.

There are many amateur radio operators who do not use the 430-450 MHz band directly, but who operate through repeater or network stations which have linked stations on this band. Also, many packet (digital) radio operators use this band, and reallocation of these frequencies would limit their ability to continue to use these bandwidth-conserving modes of communication, since the part of the 2M band which is by convention used for packet data is much smaller than the segment of the 70cm band used.

It is my experience that many amateur radio operators are experimenting with and using communications methods on this band which are very conserving of bandwidth (such as CW or packet). We also use voluntary frequency band plans to ensure an efficient use of the spectrum we have available. Having this spectrum reallocated to the Private Mobile Radio Service would render the operating equipment many of us (again, myself included) use non-usable.

It is my belief that the bandwidth needs of the Private Mobile Radio Service can be served in a method which does not involve reallocation of these critical frequencies away from the Federal government, and away from the Amateur Radio Service's secondary allocation on these frequencies. I hope you'll carefully consider the valuable services which Amateur Radio operators provide to their community, and

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the impact a reallocation would have on their ability to continue to provide those services.

Sincerely,

Matthew Cravit, N9VWG

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JUN 2 1998

MAIL ROOM

Mr. P G Chapman.  
42, Digby Avenue,  
Mapperley,  
Nottingham.  
NG3 6DU

Secretary,  
Federal Communications Commission,  
Washington DC,  
20554

23 May 1998

RM 9267 OBJECTION!

Sir,

It is with alarm I hear that the United States of America has a proposal to make changes. The changes to our 70 centre metres band of frequencies subject to international agreements. This suggested rule change will have international repercussions. We have at the moment satellites in orbit around the world. Some are now above the United States of America. These satellites are listening in the part of the radio spectrum that the proposed rule change will change. Also, our satellites transmit in the same part of the radio spectrum. These satellites are looking electronically down on you now.

The band of frequencies in the 70 centre metre bands I am really concerned about are from 435.00 MHZ to 436.00Mhz. These are in use daily by British satellites.

Sir, these satellites are used by American Citizens, as we too use American satellites. Also, you may note Japanese satellites exist using these frequencies as well. The Russians also have satellites using the same band of frequencies. The list is added to by other countries around the world. The Might as the United States of America is, it cannot shift the rest of the world.

Your Sincerely



Mr. P G Chapman G4LJL

ROYAL MAIL  
1001  
Royal Mail

Royal Mail  
25 MAY 91  
10 29 gms  
21410038

Nottingham



Great Britain  
Postage



Secretary  
Federal Communications Commission  
Washington DC  
20554  
United States of America

Aerogramme



M09/97

Name and address of sender

Mr P G Chapman  
42 Digby Avenue  
Mapperley  
Nottingham  
Postcode NG3 6DU  
ENGLAND

An aerogramme should not contain any enclosure

To open slit here

Federal Communications Commission  
Secretary of the FCC, Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Ref: RM-9267

Dear Commission:

As a licensed Amateur Radio operator I want to go on record as being strongly against the petition under consideration, RM-9267. I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications.

The frequencies stated in RM-9267, (420 MHz to 430 MHz and 440 MHz to 450 MHz) are very important to our continued success in serving the public through our work. These frequency band segments include important linking, control, amateur television and repeater systems that are used daily in the United States.

Amateur Radio has proven to be a successful secondary user to the military radar operations on these frequency bands. RM-9267 contains no technical solutions to prove that Amateur Radio users could continue to use these bands without serious interference if land mobile communications become the primary user.

Amateur Radio operators in the United States can continue to be a vital communications resource to the public during emergencies and disasters if RM-9267 is not approved.

Sincerely,

*John J. Bevil*  
56 Mill Pond St  
Beverly Hills, Calif 90208



# Edwin L. Thompson & Son, Inc.

7 Doris Drive, Suite 5  
N. Chelmsford, MA 01863

Mobile Communications Specialists

Tel: (508) 251-1420  
Fax: (508) 251-1430

May 29, 1998

DOCKET FILE COPY ORIGINAL

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas,

We are filing in support of the petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. Thank you for quickly placing the petition on public notice.

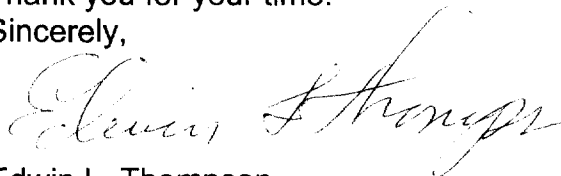
We have been in business for 29 years and employ nine people at this time. Not only are we a two-way radio dealer, but we are also a service business who is affected by lack of spectrum.

As a dealer, lack of spectrum creates crowding of users on channels and deteriorating communications quality. This, of course, leads to poor customer satisfaction and constant searching for solutions to interference, etc.

Cellular and PCS are not a solution for everyone. Besides cost, the coverage is not as good, it is too spotty and you cannot have group conversations with cellular. Many of our customers need to speak to everyone at the same time and using cellular is not a good option.

New spectrum will benefit our business by increasing private usage, which increases sales, which increases revenues, saving jobs for our employees which benefits the overall economy.

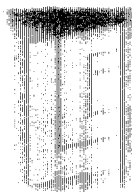
Thank you for your time.  
Sincerely,



Edwin L. Thompson  
Edwin L. Thompson & Son, Inc.

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**LAN-  
Mobile Communication**

481 Richard  
1.800.

**INC.  
Access Control Systems**

PA 17603  
2611

May 28, 1998

Ms Magalie Roman Silas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

**DOCKET FILE COPY ORIGINAL**

**Re: LMCC Petition for Rulemaking (RM-9267)**

Dear Ms Salas:

I am writing to urge the Commission to give serious consideration to the LMCC's petition to increase spectrum allocation for private wireless users. As a two-way radio dealer in the Lancaster/Harrisburg, PA area we are acutely aware of, and severely affected by the shortage of clean, available radio spectrum in our marketplace. I am pleased to see that the FCC has reacted quickly to the LMCC's request, and hope that the request will be acted upon in a timely manner.

Lan-Comm, Inc. is a supplier of radio equipment and service. We have been in business over 20 years and have seen many of our customers (and potential customers) frustrated in their attempts to create a wireless communication system that would balance their needs for fast, efficient, cost effective internal communications with the amount of radio frequency spectrum available to them as a business user. Quite often, a customer has been forced into using a commercial system such as cellular telephones, or more recently Nextel, a hybrid type of cellular phone simply because they had no other viable options. These commercial systems do not provide the group communications ability that many of our customers have relied upon for years to increase productivity and efficiency. The customer is also left to shoulder the burden of a high cost of communication, a cost that is ultimately passed on to the consumer in one form or another.

When it comes to safety and performance, many of our customers simply cannot afford to be subjected to a service availability of less than 99.9% reliability. Many commercial systems do not offer this degree of reliability, and cannot guarantee our customers priority access in cases of emergency. With cellular phones or paging service, the issue of immediate contact is a major concern in life and death situations. For most of our customers, the only way to achieve instant communications is through conventional two-way radio, yet customers are stifled by the lack of available channels in their area.

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If more radio spectrum was available to conventional private wireless radio users, we could help to eliminate some of these problems, and create customized solutions that our customers demand and deserve. A new allocation of spectrum would allow our business to flourish into the next century and provide custom solutions to an expanding group of customers that need clear, instant, and efficient communications.

Many more people are aware of the benefits of wireless communications today, yet we seem to see more and more of a "one size fits all" approach to communications systems. A new allocation of spectrum would allow increased options for our customers, and increased competition in the marketplace. The people who would benefit the most in the end would be the consumer who receives a better, less expensive product or service from a company that has an efficient communication system.

Once again, thank you for your attention to this timely matter. We hope that the FCC can address these issues quickly as the problems associated with the lack of available spectrum are increasing every business day.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert M. Smith". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert M. Smith  
President

Email: [lancomm@pptnet.com](mailto:lancomm@pptnet.com)

RECEIVED

DOCKET FILE COPY ORIGINAL

RM-9267

JUN 2 1998

Secretary

Federal Communications Commission  
FCC MAIL ROOM

1919 M Street, NW

Washington, DC

20554

MAY 14, 1998

The following are my comments to the proposed RM-9267 presented to the FCC by LMCC.

The Amateur Radio from 420 to 450 Mhz is used for Public Safety, Backbone to Amateur Radio SKYWARN advisory networks, Basic Repeater Systems and link controls for other repeater systems.

I operate the KE2LS Repeater on a coordinated frequency of 442.7 / 447.7 Mhz in the Adirondack Mountains of New York. This is one of the few repeaters within the actual High Peak Mountains. My repeater has been used during search and rescue missions for lost and injured hikers. Telephones are not common place in the mountains. In fact there are many exits on Interstate 87 in the High Peak region that have no facilities at some exits (NO PHONES). There is no Celular Telephone service in the High Peak region due to the mountains and state restrictions on towers on the high peaks which are state owned. My repeater has been used to report auto accidents, sick people and drunk drivers. Without this repeater, much delay would have taken place to find a telephone at some great distances. There a couple other repeaters in the high peak region that cover their respective areas. Complete coverage by one repeater is not possible due to the high mountains and deep valleys.

Due to this extreem mountainous region, it has become a very popular place for hiking and back packing within the 8 million acres. Amateur Radio operators hiking with portable radios are the only means to get help for injured people. Without radios, it could easily be a 8 to 10 hike to get to a telephone.

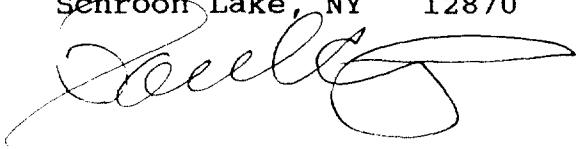
If these repeaters are not allowed to continue operation due to RM-9267, Public Safety will be GREATLY reduced. These repeaters are provided for all licensed Amateur Operators. Operation of these repeaters on a shared time basis (only on during certain periods) will not work for the life safety of the public who we serve. They must be available 24 hours a day for life safety.

Thank You for your sincer consideration in retention of these frequencies for Amateur Radio use.

Paul Mierop KE2LS

P.O. Box 22

Schroon Lake, NY 12870



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List A B C D E 0ET

Jeffrey M. Reinhardt  
5904 Lake Lindero Drive  
Agoura Hills, California 91301

DOCKET FILE COPY ORIGINAL

May 27, 1998

Federal Communications Commission  
Secretary of the FCC, Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

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JUN 2 1998

FCC MAIL ROOM

**Ref: RM-9267**

Dear Commissioners:

As a licensed Amateur Radio operator I want to go on record as being strongly opposed to the petition under consideration, RM-9267.

Should this request be approved, it would lay open all remaining Amateur Radio spectrum for reallocation to commercial interests. How could the Commission justify acting in any other way?

As you know, radio spectrum is a finite item, much like undeveloped land. The Amateur Radio frequencies have functioned in much the same manner as the National Parks. Different persons may use them for different purposes, but they are for the enjoyment of all and the commercial exploitation of none. Approval of this proposal is akin to approving the construction of condos on the rim of the Grand Canyon.

The Land Mobile service has had every opportunity to acquire spectrum in recently held spectrum auctions. Why did they not participate in those opportunities? If it is a matter of simple economics, their proposal for reallocation of the 420 ~ 450 MHz spectrum is without merit and simply an attempt to acquire something for nothing.

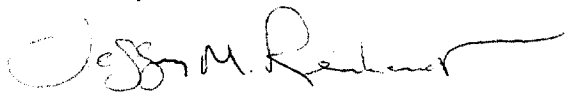
Common carriers have filled much of the need for mobile communications. Stripping away Amateur Radio and Government frequency allocations for the Land Mobile proposal makes no sense, other than for the enrichment of a few.

The frequencies stated in RM-9267, (420 MHz to 430 MHz and 440 MHz to 450 MHz) are very important to our continued success in serving the public through our work. These frequency band segments include important linking, control, amateur television and repeater systems that are used daily in Southern California.

Amateur Radio has proven to be a successful secondary user to the military radar operations on these frequency bands. RM-9267 contains no technical solutions to prove that Amateur Radio users could continue to use these bands without serious interference if land mobile communications become the primary user. This lack of detail may serve to illustrate the lack of forethought put into the application.

Amateur Radio operators across the country can continue to be a vital communications resource to the public during emergencies and disasters if RM-9267 is not approved.

Sincerely,



Jeffrey M. Reinhardt  
Amateur Call: AA6JR  
(818) 706-3853

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CENTRAL COMMUNICATIONS CORPORATION  
**CEN-COM**

FRANK HULL  
PRESIDENT  
9 INDEPENDENCE DRIVE  
LONDONDERRY NH 03053

Telephone: 432-4313  
FAX: (603) 437-1969

Ms. Magalie Roman Salas

May 29, 1998

Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

Subject: LMCC Petition for Rule Making (RM-9267)

Dear Ms. Salas,

I am filing in support of the Petition for Rule Making being pursued by LMCC seeking new spectrum allocations for private wireless users. We applaud the FCC for quickly placing the petition on public notice.

We are following these proceedings with great interest since the outcome will effect my business as well as the futures of my ten employees and their families. It will also effect the customers we have supported in their communications needs for the past 20 years.

Lack of frequency spectrum limits our potential as a business and obviously limits our customers flexibility in selecting as communication system that satisfies their needs. It also forces them to use cellular, PCS and other commercial systems that may not fit their specific needs due to coverage problems and just as important the operating cost involved.

We sincerely hope the FCC will help small business as well as those businesses we support by allocating additional spectrum in the 150 MHZ, 450 MHZ, 800 MHZ and 900 MHZ frequency ranges. It is disparately needed and the lack if the spectrum will most defiantly the future productivity and potential loss of life and property.

Thank you for your time and consideration of this request.

Sincerely,

Frank Hull  
President

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# WEAR RADIO SERVICE, INC.



28th May, 1998

DOCKET FILE COPY ORIGINAL

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, D.C. 20554

Subject: LMCC Petition for Rulemaking (RM-9267)

Wear Radio Service, Inc. is filing in support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users.

Wear Radio is a small privately owned family business celebrating fifty years in business this year. We currently employ 14 full time employees in a small town in Texas serving a large variety of businesses with two-way radio communications. There are many potential users of radio communications we are not able to address because of decisions made by the FCC regarding radio frequencies, primarily the decision to auction 800 spectrum causing a freeze on license applications but not providing frequencies for small business to obtain. I am sure you are aware small companies cannot spend millions of dollars to buy frequencies and then construct systems and pay off debt.

The impact on small rural customers is critical to their businesses not only must they look to other means to communicate, but pay a high price for service if and when they can find it. Recently in this area customers went from \$15.00 per radio unit to \$27.00 per unit due to the predominate carrier in the area driving their rate up with no warning. Due to the economy in small communities these types of rate increases can only be absorbed by the local businesses and not passed on to their customers.

Wear Radio has and will continue to provide good inexpensive service to it's customers if it is allowed to do so. However, if decisions in Washington continue to favor large businesses then it will be more and more difficult for us to serve our community.

Sincerely,

Sheila Crowe  
President

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DET

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JUN 2 1998

DOCKET FILE COPY ORIGINAL

RM-9267  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC  
20554

FCC MAIL ROOM

MAY 14, 1998

The following are my comments to the proposed RM-9267 presented to the FCC by LMCC;

The Amateur Radio from 420 to 450 Mhz is used for Public Safety, Backbone to Amateur Radio SKYWARN advisory networks, Basic Repeater Systems and link controls for other repeater systems.

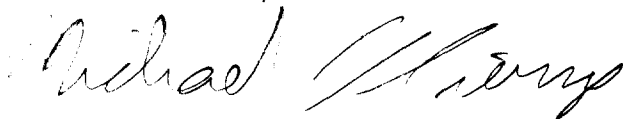
I am control operator for the KE2LS repeater operating on 442.7 /447.7 Mhz in the Adirondack Mountains of New York. This is one of the few repeaters within the actual High Peak Mountains. This repeater has been used during search and rescue missions for lost and injured hikers. Telephones are not common place in the mountains. In fact there are many exits on Interstate 87 in the High Peak region that have no facilities at some exits (NO PHONES). There are no Celular Telephone service in the High Peak region due to the mountains and state restrictions on towers on the high peaks which are state owned. This repeater has been used to report auto accidents, sick people and drunk drivers. Without this repeater, much delay would have taken place to find a telephone at some great distances. There a couple other repeaters in the high peak region that cover their respective areas. Complete coverage by one repeater is not possible due to the high mountains and deep valleys.

Due to this extreem mountainous region, it has become a very popular place for hiking and back packing within the 8 million acres. Amateur Radio operators hiking with portable radios are the only means to get help for injured people. Without radios, it could easily be a 8 to 10 hike to get to a telephone.

If these repeaters are not allowed to continue operation due to RM-9267, Public Safety will be GREATLY reduced. These repeaters are provided for all licensed Amateur Operators. Operation of these repeaters on a shared time basis (only on during certain periods) will not work for the life safety of the public who we serve. They must be available 24 hours a day for life safety.

Thank You for your sincer consideration in retention of these frequencies for Amateur Radio use.

Michael Mierop N2JTC  
P.O. Box 22  
Schroon Lake, NY 12870



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DOCKET FILE COPY ORIGINAL

Richard Green  
20730 SE 293<sup>rd</sup> St.  
Kent WA 98042

May 29, 1998

Federal Communications Commission  
1919 M Street NW  
Washington D.C. 20554

Ref: **RM-9267**

Gentlemen:

I am writing to add my voice to the many who have or will write you to oppose the proposal to reallocate 420 MHz to 430 MHz and 440 MHz to 450 MHz away from the Federal government over to the Private Mobile Radio Service on a primary basis as proposed by the Land Mobile Communications Council.

This is not a good deal for the nation, its people, or the government. While Amateur Radio is a secondary user of these frequencies, there are literally thousands of FM repeaters across the nation operating from 440 to 450 MHz that serve a vital function for emergency operations, disaster relief, and other public service benefits. Any decrease in capability in these bands of frequencies is unacceptable, as you can imagine. It doesn't take a rocket scientist ( of which I am one) to figure out that giving away this spectra to commercial interests is not in the best interest of our country.

Please reject the proposed RM-9267.

Sincerely,



Richard Green, Ph.D.

No. of Copies rec'd 0  
List A B C D E 08T

From: c.w.davis  
Full-Name: Charlene E Davis  
Subject: fcc letter re rm-9267  
X-Status: New

DOCKET FILE COPY ORIGINAL

Federal Communications Commission  
Office of the Secretary  
Room 222  
1919 M Street NW  
Washington DC 20554

Re: Opposition to RM-9267 Land Mobile Communications Council Petition For  
70  
CM

Dear Sir:

On April 22, 1998 the Land Mobile Communications Council filed a petition with you, RM-9267, that seeks to reallocate the frequency bands 420-430 and 440-450 MHz for the use of the Private Mobile Radio Service. These bands are now heavily used by Radio Amateurs for a variety of public service and public interest communications. The reallocation proposed by LMCC is incompatible with these operations.

Currently I represent Net Control for a system of Amateur Radio repeaters that are linked together to cover an large geographic area - from southeastern British Columbia to northeastern Oregon, and from western Montana to central Washington. This system can also be connected to another group of repeaters located in the northwestern United States and western Canada. The primary purpose of this system is to provide emergency and public service communications within this area. It makes possible a single system of mobile communications coverage extending beyond the limited range provided by any single repeater operation. The FM repeaters operate in the VHF and UHF frequency area. If the UHF frequencies are reallocated to LMCC, it may disrupt this existing system which currently in heavy use by Radio Amateurs.

For the above reasons I hope you will not allow the reallocation of these frequencies. I appreciate your attention in this matter.

Respectfully,

Charlene E. Davis  
KC7RQF  
Net Control -Thursdays.  
Kamiak Butte Amateur Repeater Association

*Charlene E Davis*  
5/26/98

0

Richard J. Roux  
WB6KTW  
6105 Ridgetop Terrace  
Bakersfield, CA 93306

Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554  
Attn: Secretary

May 27, 1998

Subject: Proposed RM 9267

Gentlemen:

This letter is to advise of my opposition to the to the above subject RM 9267 proposal.

For years the amateur radio community has used the 70cm band allocation for FM repeater operation, satellite links and amateur television in connection with AMATEUR RADIO EMERGENCY SERVICE/RADIO AMATEUR CIVIL EMERGENCY SERVICE and other public service activities when communication has been needed. Since I live in "earthquake country" I believe the service that the radio amateurs provide for disasters should not be discontinued!

Please give consideration to allowing the radio amateurs to continue the valuable operation of providing public service communication in the 70cm portion of the radio spectrum as they have in the past.

Sincerely,





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# RENTCOMM



4809 COLORADO BOULEVARD • DENVER, COLORADO 80216

May 28, 1998

TO: MS. MAGALIE ROMAN SALAS  
SECRETARY, FCC  
ROOM 222  
1919 M STREET, NW  
WASHINGTON, D.C. 20554


RE: LMCC PETITION FOR RULE MAKING (RM-9267)

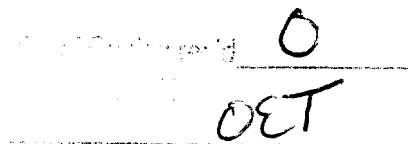
This letter is written to inform you of our position with regard to the allocation of additional spectrum for private wireless users. The consistent erosion of frequencies and spectrum has caused considerable hardship for RENTCOMM employees and customers. It is imperative that the FCC allocate additional spectrum for the use of private wireless users. Thank you in advance for your consideration of this matter as it is critical for us to continue to pay our people and have them support their families and communities.

RENTCOMM is a land mobile 2 way radio dealer in Denver, CO with auxiliary offices in Ft. Pierce, FL., Cocoa Beach, FL., Crystal Falls, MI., Nebraska City, NE. and Tucson, AZ. Rentcomm provides equipment and services to over two thousand customers for two way communications. Although RENTCOMM does carry some product and service offerings in the cellular and PCS areas, the vast majority of our business is two way radio based. The radio is so crowded that it is all but impossible to find usable spectrum - PLEASE HELP!

Cellular, PCS, NEXTEL cannot meet the needs of customers for local area and regional coverage, additionally none of these products are instant on type products and there is always a safety issue. We provide communications equipment for all types of activities and almost always the main reason that our customers utilize radio is for safety.

Sincerely,

  
Tracy N. Tippet  
Vice President

  
OCT



# CHICAGO COMMUNICATION SERVICE INC.

SALES: 800-831-3223

SERVICE: 800-833-1968



**MOTOROLA**  
Authorized Two-Way  
Radio Dealer

RECEIVED  
JUN 2 1998  
FCC MAIL ROOM

27 May, 1998

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

Re: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas

*Chicago Communication Service is filing in support of the Petition for Rulemaking filed by the LMCC seeking new spectrum for private wireless users. We would be grateful should the FCC place the petition on public notice.*

*As both a provider and servicer of over twenty thousand two-way radios we have watched as available spectrum has dwindled to nothing. Without spectrum we have nothing to sell or service. The future of a 45 year old company with over one hundred employees is at stake.*

*We are continuously asked for wide area solutions to our customers' needs. Our only answer is Nextel. Unfortunately, most of these same people making the request have been forced off 800 MHZ SMRs because those frequencies were sold to Nextel. Not only would they be required to buy new equipment but they would be paying twice the previous monthly fee.*

*The auctions have placed a dollar amount on spectrum that only major corporations can afford. They have in fact monopolized the industry. If this continues companies like ours will cease to exist.*

*We ask that the FCC address these issues quickly being the problem is escalating at an alarming rate.*

Sincerely,

Rick Werner  
Vice President

Reply To:

☒ 200 Spangler Avenue  
Elmhurst, IL 60126  
630-832-3311

☐ 955 W. Madison Street  
Chicago, IL 60607  
312-829-2700

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RM 9267  
Secretary  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

May 29, 1998

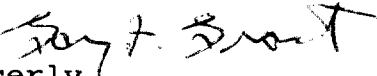
Dear Sir:

I would like to voice my concern and opposition to the Land Mobile Communication Council (LMCC) proposal for the the use of the 70 CM band.

This proposal would have a negative impact for Amateur Radio repeater and control with the resultant potential interference problems in the 70 CM band.

The use of Amateur radio in emergency communications situations using amateur radio repeaters in both the 2 meter and 70 CM bands could also be effected if this proposal is accepted.

As a person that has the highest priority for amateur radio emergency services I would like to voice my concerns of use of these frequencies in the Private Mobile Radio Service as requested by the LMCC.

  
Sincerely,  
Gary F. Grant K7VY  
11040 Broken Hill Rd.  
Reno, Nevada 89511

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MAY 28 1998

DOCKET FILE COPY ORIGINAL

SECRETARY , RM 9267  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M STREET NW  
WASHINGTON DC 20554

DEAR COMMISSION :

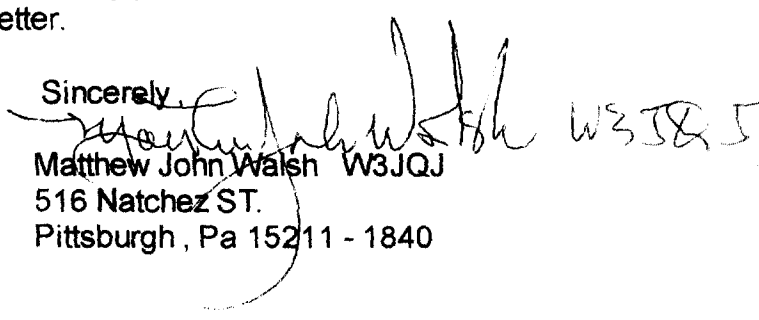
I am writing this letter to voice my opposition to the petition filed by the Land Mobile Communications Council (LMCC) seeking immediate allocation of the 420-450 MHz band from federal use to the Private Mobile Radio Service (PMRS).

This band is heavily utilized by Amateur Radio operators, using repeaters for everyday, and emergency communications, and also for satellite and weak-signal work, and to help further communications technology. It would be an unreasonable burden on the Amateur Radio Service to move them out of this band, given the above stated uses. Although the LMCC indicates that they would be willing to share these frequencies with hams, I feel that once they have this band in their possession that this would not be the case; we would eventually be pushed out. Limited non-government, non-amateur use of this band is permitted, but amateurs have priority over such use. I believe that the LMCC has misinterpreted the significance of amateur secondary status by stating that amateur applications in this band should remain secondary to the PMRS. (Currently the Amateur Radio Service is secondary to the military radiolocation service in this band.) Also, the LMCC has offered no ideas on how this band could be shared with the Amateur Service.

The recent failure of the Galaxy IV satellite illustrates our dependence on communications in our everyday life. If this was to happen again on a more catastrophic scale, hams would be standing by, able to provide emergency communications, BUT NOT IF OUR FREQUENCIES ARE TAKEN AWAY ONE BAND AT A TIME. Without these frequencies we cannot continue to serve in the public's interest.

I hope you will take this into consideration when rendering your decision. Thank you for your time on this matter, and for reading this letter.

Sincerely,

  
Matthew John Walsh W3JQJ  
516 Natchez ST.  
Pittsburgh, Pa 15211 - 1840

cc: hon. william J. Coyne 14th cong/dist.

# WESTERN INTERTIE NETWORK

2040 Hawley Drive, Vista, CA 92084

Phone: 760/ 724-4020 Fax: 760/ 944-4601

May 15, 1998

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RECEIVED  
JUN 2 1998  
FCC MAIL ROOM

Secretary  
Federal Communications Commission  
Washington DC, 20554

RE: RM 9267

Gentlemen,

It has come to our attention that the LMCC is demanding that you immediately reallocate most of the 420 to 450 MHz band presently in the amateur radio service. We strongly oppose any such action!

The 420 to 450 MHz amateur radio UHF band is the second most popular of the amateur radio services' VHF and UHF allocations. There are thousands of FM repeaters operating daily from 440 to 450 MHz, and a variety of modes on the air every day in the 420 to 430 MHz segment, including thousands of point to point links, and a very mature amateur television fraternity.

We at the Western Intertie Network (the WIN System) presently operate five high level UHF repeaters in the 440 to 450 MHz segment, covering from Southern Arizona to Central California, including all of the seven Counties of Southern California. We also operate ten point to point full duplex links.

Our group, the WIN System, has been affiliated with the San Diego County RACES emergency preparedness organization for years, and because of our wide area coverage, we have been able to handle innumerable pieces of emergency traffic during three major fires and two major earth quakes. It is impossible to estimate how many lives we have directly touched during emergencies, however, I am certain we have been a major communications force during these times of emergencies.

The WIN System also routinely operates many of our repeaters for public safety missions. Several times each year WIN System repeaters are used to handle communications at various Marathons, 10K runs, Bicycle Events, and Special Olympics Events for the handicapped. These public service communications activities would be impossible to achieve without the 440 MHz amateur band "wide area coverage" repeaters operated by the WIN System, and donated to public service.

We therefore strongly urge you to deny the demands of the LMCC. We as amateur radio operators continue to provide the above services free to the public. There is never a charge for either the 440 MHz repeater equipment, or the operators who donate their time and expertise during these times of public service. I do not think the LMCC would likewise provide such services free to the public. Their agenda is to make a profit from these frequencies, not to serve the public, free of charge, as is the amateur credo.

Sincerely,



Valerie Lambdin, KF6ARF  
P. O. Box 362  
Big Bear Lake, CA 92315  
(909) 585-8531

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REFERENCE PETITION RM-9267

May 28, 1998

FEDERAL COMMUNICATION COMMISSIONS  
SECRETARY ROOM 222  
1919 M STREET, N. W.  
WASHINGTON, D. C. 20554

RECEIVED  
JUN 2 1998  
FCC MAIL ROOM

DEAR COMMISSION:

I AM THE DISASTER CHAIRMAN FOR THE EAST SAN GABRIEL  
VALLEY CHAPTER OF THE AMERICAN RED CROSS-. I AM ALSO A  
MEMBER OF THE COMMUNICATIONS COMMITTEE.

WE DEPEND A LOT ON THE AMATEUR RADIO OPERATORS FOR  
COMMUNICATIONS IN TIME OF DISASTER. THEY ARE ABLE TO  
PROVIDE US WITH BOTH PEOPLE AND EQUIPMENT FAR BEYOND  
WHAT THE RED CROSS CAN GET IN ANY OTHER MANNER.

I WAS RECENTLY TOLD THAT THE FREQUENCY THEY ARE  
USING FOR THEIR REPEATER TO PROVIDE US WITH THIS  
SERVICE MAY BE IN JEOPARDY.

**I URGE YOU NOT TO APPROVE PETITION RM-9267**



JAMES W. LABADIE  
DISASTER CHAIRMAN  
EAST SAN GABRIEL VALLEY AMERICAN RED CROSS  
1838 EAST WORKMAN AVE.  
WEST COVINA CALIF. 91791-1421

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